

**MEMO ENDORSED**

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December 16, 2021

**VIA ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Gergely Csikos v. S.M. Construction & Contracting, Incorporated, et al.  
Docket No.: 18-cv-09598-VEC

Your Honor:

As you may recall, we represent Plaintiff, Gergely Csikos, in the above referenced action.

On December 3, 2021, this Honorable Court issued an Opinion and Order denying plaintiff's motion for summary judgment.

Plaintiff's counsel believes that there is a good-faith basis, pursuant to Local Civil Rule 6.3., to file a motion for reconsideration of Mr. Csikos' Labor Law §240(1) claim.

According to said Local Rule, the motion for reconsideration must be filed by December 17, 2021. Although we have attempted to file the motion timely, the undersigned, as well as several other key employees at the firm have recently have been out ill.

In light of the above, plaintiff's counsel is requesting a brief, one week, extension of time, until December 24, 2021, to file the above-mentioned motion for reconsideration.

Plaintiff thanks this Honorable Court for its time and attention to this matter.

Respectfully yours,



Holly Ostrov Ronai (HO3923)

Cc: All parties via ECF

Application GRANTED. Plaintiff's must move for leave to file a motion for reconsideration by **December 24, 2021**. Defendants must file their opposition, if any, by **January 21, 2022**. Plaintiff's reply is due by **February 4, 2022**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

12/17/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE